

**Elden M. Rosenthal, OSB No. 722174**

Email: [elden@rgdpdx.com](mailto:elden@rgdpdx.com)

**Michael A. Greene, OSB No. 802445**

Email: [mike@rgdpdx.com](mailto:mike@rgdpdx.com)

**John T. Devlin, OSB No. 042690**

Email: [john@rgdpdx.com](mailto:john@rgdpdx.com)

Rosenthal Greene & Devlin, P.C.

121 SW Salmon Street, Suite 1090

Portland, OR 97204

Phone: (503) 228-3015

Fax: (503) 228-3269

Of Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
EUGENE DIVISION

DEREK JOHNSON, personal representative of  
KELLY CONRAD GREEN II, deceased; KELLY  
CONRAD GREEN; and SANDY PULVER,

Plaintiffs,

v.

CORIZON HEALTH, INC., a Tennessee  
Corporation; LANE COUNTY, an Oregon county;  
DR. CARL KELDIE, an individual; DR. JUSTIN  
MONTROYA, an individual; VICKI THOMAS, an  
individual; KIRSTIN WHITE, an individual;  
SHARON EPPERSON (née FAGAN, an  
individual; and JACOB PLEICH, an individual,

Defendants.

**Civil Action No. 6:13-cv-01855-TC**

**PLAINTIFF'S PROPOSED VOIR  
DIRE QUESTIONS**

Plaintiffs ask the Court to conduct voir dire on the following subjects:

- 1) Please tell us about your educational background.
  - a. If you attended college or graduate school, please tell us  
where you went to college or graduate school, your major,

and degrees that you earned.

- 2) Please tell us your family background (marriages, divorces, children, grandchildren).
- 3) Please share with us your employment history.
- 4) What cities have you lived in during your lifetime?
- 5) Do you live or work in Lane County?
- 6) Please share with us what you do in your recreational time. Do you have any hobbies?
- 7) Have you ever been involved in a lawsuit? If so, please explain the circumstances.
- 8) Do you know anyone who suffers, or has suffered, from a mental health problem that required medical treatment? If so, please explain the circumstances.
- 9) Do you know anyone who suffers, or has suffered, from schizophrenia? If so, please explain what you know about that person's schizophrenia.
- 10) Do you know anyone who has suffered a closed head injury? If so, please explain how it occurred and what treatment was provided.
- 11) Do you know anyone who has been inside a jail? If so, please explain the circumstances.
- 12) Do you know anyone who works in the medical field or mental health field?  
If so, please explain the circumstances.

- 13) Do you know anyone who works for a government agency? If so, please explain the circumstances. In particular, do you know anyone who works for Lane County?
- 14) Do you know anyone who works in a jail or a prison? If so, please explain the circumstances. In particular, do you know anyone who works for Corizon or Lane County Jail?
- 15) The plaintiffs in this case will be asking for economic damages in the form of medical expenses. How do you feel about awarding economic damages, if you find that the evidence supports those damages?
- 16) The plaintiffs in this case will be asking for damages for pain and suffering. How do you feel about awarding money for this type of damages?
- 17) The plaintiffs in this case are also asking for an award of punitive damages.
  - a. Have you heard about cases involving punitive damages?
  - b. Do you have any opinions about punitive damages?
- 18) In this case, the parents of Casey Green are asking for damages for the death of their son. Do you have any feelings about awarding damages to the parents of an adult disabled child who has died?

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DATED this 18<sup>th</sup> day of May, 2015.

ROSENTHAL GREENE & DEVLIN, PC

/s/ Elden M. Rosenthal

**Elden M. Rosenthal**, OSB No. 722174

Email: [elden@rgdpdx.com](mailto:elden@rgdpdx.com)

**Michael A. Greene**, OSB No. 802445

Email: [mike@rgdpdx.com](mailto:mike@rgdpdx.com)

**John T. Devlin**, OSB No. 042690

Email: [john@rgdpdx.com](mailto:john@rgdpdx.com)

Phone: (503) 228-3015

Fax: (503) 228-3269

Of Attorneys for Plaintiffs

## CERTIFICATE OF SERVICE

I hereby certify that I served true and correct copies of the foregoing:

### 1. PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

on the following:

James Daigle  
Adam Heder  
*Stewart Sokol & Larkin LLC*  
2300 SW First Ave., Suite 200  
Portland, OR 97201  
[jmdaigle@lawssl.com](mailto:jmdaigle@lawssl.com)  
[aheder@lawssl.com](mailto:aheder@lawssl.com)

Richard K. Hansen  
Anne M. Talcott  
*Schwabe, Williamson & Wyatt, P.C.*  
1211 SW 5th Ave., Suite 1900  
Portland, OR 97204  
[rhansen@schwabe.com](mailto:rhansen@schwabe.com)  
[atalcott@schwabe.com](mailto:atalcott@schwabe.com)

Of Attorneys for Corizon defendants.

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Robert L. Goldstucker  
*Nall & Miller, LLP*  
235 Peachtree St., NE  
Suite 1500 – North Tower  
Atlanta, GA 30303-1418  
[bgoldstucker@nallmiller.com](mailto:bgoldstucker@nallmiller.com)

Sebastian Tapia  
Stephen Dingle  
*Lane County Counsel*  
125 East 8<sup>th</sup> Avenue  
Eugene, OR 97401  
[Sebastian.tapia@co.lane.or.us](mailto:Sebastian.tapia@co.lane.or.us)  
[Stephen.dingle@co.lane.or.us](mailto:Stephen.dingle@co.lane.or.us)

Of Attorneys for Corizon defendants.

Of Attorneys for Lane Co. defendant.

by the following method/s:

☐ mail with postage prepaid, deposited in the US mail at Portland, OR  
☒ service made via electronic mailing and/or CM/ECF filing  
☐ hand delivery  
☐ facsimile transmission  
☐ overnight delivery.

Dated this 18<sup>th</sup> day of May, 2015.

/s/ Elden M. Rosenthal  
ELDEN M. ROSENTHAL, OSB No. 722174  
MICHAEL A. GREENE, OSB No. 802445  
JOHN T. DEVLIN, OSB No. 042690  
*Of Attorneys for Plaintiff*